

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION**

UNITEDHEALTHCARE INSURANCE
COMPANY AND UNITED HEALTHCARE
SERVICES, INC.,

Plaintiffs,

vs.

TEAM HEALTH HOLDINGS, INC.,
AMERITEAM SERVICES, LLC, and HCFS
HEALTH CARE FINANCIAL SERVICES,
LLC,

Defendants.

Case No. 3:21-CV-00364-DCLC-DCP

**JOINT MOTION TO APPROVE STIPULATION REGARDING DISCOVERY OF
ELECTRONICALLY STORED INFORMATION AND PROPOSED ORDER**

Pursuant to the Court's Scheduling Order, Plaintiffs United Healthcare Services, Inc., UnitedHealthcare Insurance Company, and UMR, Inc. and Defendants Team Health Holdings, Inc., Ameriteam Services, LLC, and HCFS Health Care Financial Services, LLC have conferred and agreed upon the terms of a stipulation regarding the discovery of electronically stored information in this matter. The Stipulation regarding Discovery of Electronically Stored Information and Proposed Order are attached hereto as Exhibit 1. The Parties respectfully request that the Court enter the agreed Stipulation to govern the discovery of electronically stored information in this matter.

Respectfully submitted,

Dated: January 5, 2023.

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